

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**CITIBANK, N.A AS TRUSTEE FOR AMERICAN HOME  
MORTGAGE ASSETS  
TRUST 2006-3, MORTGAGE BACKED PASS-THROUGH  
CERTIFICATES SERIES 2006-3**

**VS**

**C.A. NO:1:18-cv-427-JJM**

**KATHERINE L. CAITO  
INTERNAL REVENUE SERVICE**

**AFFIDAVIT OF JOSEPH C. MANERA, JR.**

I, Joseph C. Manera, Jr., being duly sworn, state the following:

1. I am an attorney at law, with an office located at 1062 Reservoir Avenue, Cranston, Rhode Island 02920.
2. I have been licensed as an attorney in the State of Rhode Island since 1974.
3. A significant portion of my law practice as an attorney has consisted of real estate closings and title searches.
4. I am familiar with the charges for title searches and title reports.
5. I have regularly conducted title searches and have hired title abstractors to do title searches and am familiar with the normal and reasonable cost for such title searches and title reports.

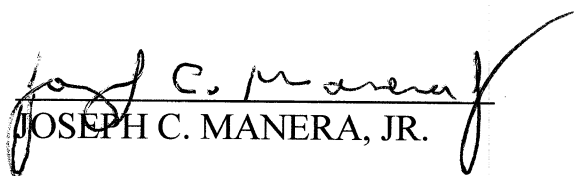
6. I have reviewed Exhibit A, attached to this affidavit, which indicates that there was a \$282.00 charge for a title report charged to the Defendant on November 6, 2019.

7. The Defendant's property is located in Westerly where titles can be searched online.

8. The charge of \$282.00 for a Title Report in November, 2015 is not a reasonable charge for a title search and title report by a non- attorney. A reasonable charge for a non -attorney is no more than \$150.00, which involves running the title from the start date and preparing a conclusion sheet. After the conclusion sheet is prepared, a report on title or a Title commitment would be issued stating the status of the title. A Title Commitment is prepared by the Title Company, which insures the title.

9. If the search is done online, then the reasonable charge should be reduced below \$150.00.

10. I based my conclusions on upon my experience as a Title Attorney and an Attorney who has done title searches and title reports and because I am familiar with the costs and charges for title searches and title reports since 1974.

  
JOSEPH C. MANERA, JR.

Subscribed and sworn to before me on July 17, 2019 under the pains and penalties of perjury.

  
NOTARY PUBLIC

# EXHIBIT A



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CKEN  
MSX-PWBC

LOAN#: [REDACTED] INVESTOR#: 4009 POOL#: 1 DATE PAYMENT DUE: 05/01/2012 INTEREST RATE: 3.65800  
BORR1: Katherine L Calto  
PROP: 16 Yosemite Valley Rd  
PROPERTY: Westbury RI 02891-5622  
MAIL: Cranston RI 02920-6012

PRINCIPAL BAL: 4,622,474.40  
ESCROW BAL: -210,438.82

Check/Ref. Number	Date Payment Due	Date Payment Received	Date Assess/Transaction	Description	Amount Applied/Assessed	Principal Application	Interest Application	Escrow Application	Optional Products	Late Charges	Other (See Description)	Suspense Application	Principal Balance	Escrow Balance	Suspense Balance
			08/07/217	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			09/08/217	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			10/10/217	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			11/13/217	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			12/13/217	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			01/11/218	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			02/14/218	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			03/16/218	Service of Process	-10.84	0.00	0.00	0.00	0.00	0.00	-10.84	0.00	0.00	0.00	0.00
			03/06/218	Property Valuation	-110.00	0.00	0.00	0.00	0.00	0.00	-110.00	0.00	0.00	0.00	0.00
			04/21/218	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			05/08/218	Property Inspection Fee	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			05/08/218	Ship Trace/Search	-5.46	0.00	0.00	0.00	0.00	0.00	-5.46	0.00	0.00	0.00	0.00
			06/20/218	Property Inspection	-22.10	0.00	0.00	0.00	0.00	0.00	-22.10	0.00	0.00	0.00	0.00
			07/26/218	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			08/20/218	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			09/20/218	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			10/22/218	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			12/03/218	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			01/04/219	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			02/06/219	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			03/07/219	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
			04/26/219	Property Inspection	-14.50	0.00	0.00	0.00	0.00	0.00	-14.50	0.00	0.00	0.00	0.00
				Ending Balance	0.00	0.00	0.00	0.00	0.00	-21,282.05	-6,231.49	0.00	0.00	0.00	0.00